



Order Filed on July 19, 2019
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
DAVID A. KASEN, ESQUIRE
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ID# DK1778

In Re:

RONALD BRODIE,

Debtor.

Case No.: 19-21672/ABA

Hearing Date: 7/12/19

Judge: Altenburg

**CONSENT ORDER VOIDING JUDICIAL LIENS OF LANDMARK GROWTH
CAPITAL PARTNERS, L.P., LANDMARK IAM GROWTH CAPITAL, L.P.,
FLASTER GREENBERG, P.C. AND NOBLE OPPORTUNITY FUND II L.P.**

The relief set forth on the following pages, numbered two (2) through four (4) is hereby **ORDERED**.

DATED: July 19, 2019



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

Case No.: 19-21672/ABA

Debtor(s): Ronald Brodie

Caption of Order: **CONSENT ORDER VOIDING JUDICIAL LIENS OF
LANDMARK GROWTH CAPITAL PARTNERS L.P., LANDMARK IAM
GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE
OPPORTUNITY FUND II L.P.**

THIS MATTER having been opened to the Court by David A. Kasen, Esquire, of Kasen & Kasen, attorneys for the above-named debtor, pursuant to a Notice of Motion seeking an Order voiding the judicial liens of Landmark Growth Capital Partners, L.P., Landmark IAM Growth Capital, L.P., Flaster Greenberg, P.C. and Noble Opportunity Fund II, L.P. and pursuant to an Application and Order Shortening Time and it appearing that no opposition to the Motion was filed by Flaster Greenberg, P.C. and Noble Opportunity Fund II, L.P. and it further appearing that opposition to the Motion was filed by Landmark Growth Capital Partners, L.P. and Landmark IAM Growth Capital, L.P. by Joel R. Glucksman, Esq. and it further appearing that the Debtor and Landmark Growth Capital Partners, L.P. and Landmark IAM Growth Capital, L.P. have resolved their differences as set forth in this Consent Order and it further appearing that at the hearing before the Court, the Court found that the formula for impairing an exemption by the aforesaid judicial liens as set forth in § 522 (f)(2) has been met, and for good cause shown;

IT IS HEREBY ORDERED that the judicial lien of Landmark Growth Capital Partners, L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division, Burlington County, Judgment No. J-220003-2016, entered on November 22, 2016 in favor of Landmark Growth Capital Partners, L.P., and against Ronald Brodie, in the amount of \$731,246.10, plus attorney's fees of \$18,268.39, plus costs of \$340.00 is void

Case No.: 19-21672/ABA

Debtor(s): Ronald Brodie

Caption of Order: **CONSENT ORDER VOIDING JUDICIAL LIENS OF LANDMARK GROWTH CAPITAL PARTNERS L.P., LANDMARK IAM GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE OPPORTUNITY FUND II L.P.**

as to Ronald Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Landmark IAM Growth Capital, L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division, Burlington County, Judgment No. J-220003-2016, entered on November 22, 2016 in favor of Landmark IAM Growth Capital, L.P., and against Ronald Brodie, in the amount of \$348,240.19, plus attorney's fees of \$8,715.94, plus costs of \$340.00 is void as to Ronald Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Flaster Greenberg, P.C., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division, Camden County, Judgment No. J-133147-2017, entered on August 14, 2017 in favor of Flaster Greenberg, P.C., and against Ronald Brodie, in the amount of \$65,792.24, is void as to Ronald Brodie, pursuant to § 522(f) of the Bankruptcy Code.

IT IS FURTHER ORDERED that the judicial lien of Noble Opportunity Fund II, L.P., which encumbers 810 Joshua Court, Moorestown, New Jersey 08057, by virtue of the Judgment docketed in the Superior Court of New Jersey, Law Division, Burlington County, Judgment No. J-195439-2018, entered on November 17, 2018 in favor of Noble Opportunity Fund II, L.P., and against Ronald Brodie and others, in the amount of \$1,504,361.84, is void as to Ronald Brodie only, pursuant to § 522(f) of the Bankruptcy Code.

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Debtor(s): Ronald Brodie

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LANDMARK GROWTH CAPITAL PARTNERS L.P., LANDMARK IAM
GROWTH CAPITAL, L.P., FLASTER GREENBERG, P.C. AND NOBLE
OPPORTUNITY FUND II L.P.**

We hereby consent to the form and entry of the within Consent Order.

KASEN & KASEN, Attorneys for Ronald Brodie, Debtor

/s/ David A. Kasen

By: DAVID A. KASEN, ESQ.

SCARINCI & HOLLENBECK, Attorneys for Landmark Growth Capital Partners, L.P.
and Landmark IAM Growth Capital, L.P.

/s/ Joel R. Glucksman

By: JOEL R. GLUCKSMAN, ESQ.

Certificate of Notice Page 5 of 5
United States Bankruptcy Court
District of New Jersey

In re:
Ronald Brodie
Debtor

Case No. 19-21672-ABA
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 2

Date Rcvd: Jul 19, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 21, 2019.

db #+Ronald Brodie, 810 Joshua Court, Moorestown, NJ 08057-3830
aty +Kasen & Kasen, 1874 E Marlton Pike, Cherry Hill, NJ 08003-2044

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.
While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 21, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 19, 2019 at the address(es) listed below:

Daniel F. Corrigan on behalf of Creditor Noble Opportunity Fund II, LP
dcorrigan@windelsmarx.com, mslama@windelsmarx.com
David A. Kasen on behalf of Debtor Ronald Brodie dkasen@kasenlaw.com
Jeffrey M. Sponder on behalf of U.S. Trustee U.S. Trustee jeffrey.m.sponder@usdoj.gov,
jeffrey.m.sponder@usdoj.gov
Joel R. Glucksman on behalf of Creditor Landmark IAM Growth Capital, LP jglucksman@sh-law.com,
rjoyce@sh-law.com
Joel R. Glucksman on behalf of Creditor Landmark Growth Capital Partners, LP
jglucksman@sh-law.com, rjoyce@sh-law.com
Kevin Gordon McDonald on behalf of Creditor BANK OF AMERICA, N.A. kmcdonald@kmlawgroup.com,
bkgroup@kmlawgroup.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 7